



ALLEN S. LAVIN

ATTORNEY



JOANNE H. ALTER
 THOMAS S. FULLER
 EDWARD W. GJERTSEN
 WILLIAM A. JASKULA
 NELLIE L. JONES
 JAMES C. KIRIE
 CHESTER P. MAJEWSKI
 NICHOLAS J. MELAS
 RICHARD J. TROY

July 9, 1980

US EPA RECORDS CENTER REGION 5



522817

Mr. Delbert D. Haschemeyer
 Deputy Director
 Environmental Protection Agency
 2200 Churchill Road
 Springfield, Illinois 62706

Dear Del:

As discussed in our recent telephone conversation, I am forwarding with this letter permit applications for District sludge processing and utilization sites in Cook County, Illinois. Certain of these properties had been subject to an I.E.P.A. notice of alleged violation. After these matters had been discussed at various meetings in your office, the District agreed to submit permit applications in an effort to resolve the present dispute and to prevent future difficulties for these activities under the District's solids program.

The Notices of Violation were broken down into three categories as identified in your letter of May 28, 1980:

1. Sites owned by the District receiving high sludge loading rates for reclamation and landscaping. The Palos Heights site was the subject of your notice of November 27, 1979. Attachment one to this letter is the District's permit application which includes our past activities on the Palos Heights site and our proposal to complete the project.

2. Sites owned by the District where sludge processing and distribution activities are taking place. Attachment two is the District's permit application for amendments to its NPDES permit to include such activities.

3. Sites owned by third parties receiving applications of District sludge at high loading rates.

- (a) The Ottawa Silica Company property was subject to an I.E.P.A. Notice of Violation dated February 14, 1980, which was resolved by the issuance of an I.E.P.A. permit.

Mr. Delbert D. Haschemeyer

Page Two

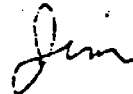
July 9, 1980

- (b) The City of Chicago site at 103rd Street and Doty Avenue was the subject of a Notice of Violation dated January 11, 1980. After several meetings with I.E.P.A., and extended negotiations with the City of Chicago, a closure program has been proposed to resolve this long-standing problem. Attachment three is a letter dated July 3, 1980 from Commissioner John A. Donovan requesting your approval at the earliest possible date. The District had previously identified the closure plan in a letter from the General Superintendent dated June 18, 1980.

It is anticipated that these permit applications will suffice as the corrective action requested in the various Notices of Violation. The District is especially anxious that the Notice of Violation as to the City of Chicago property be withdrawn so that work can resume on the closure plan under District contracts awarded for this program. Due to time constraints imposed by these contracts and the seasonal nature of our program, I would appreciate if you could telephone me as to your determination on the City of Chicago closure plan.

I again wish to acknowledge your cooperation in these efforts to resolve these long-standing problems.

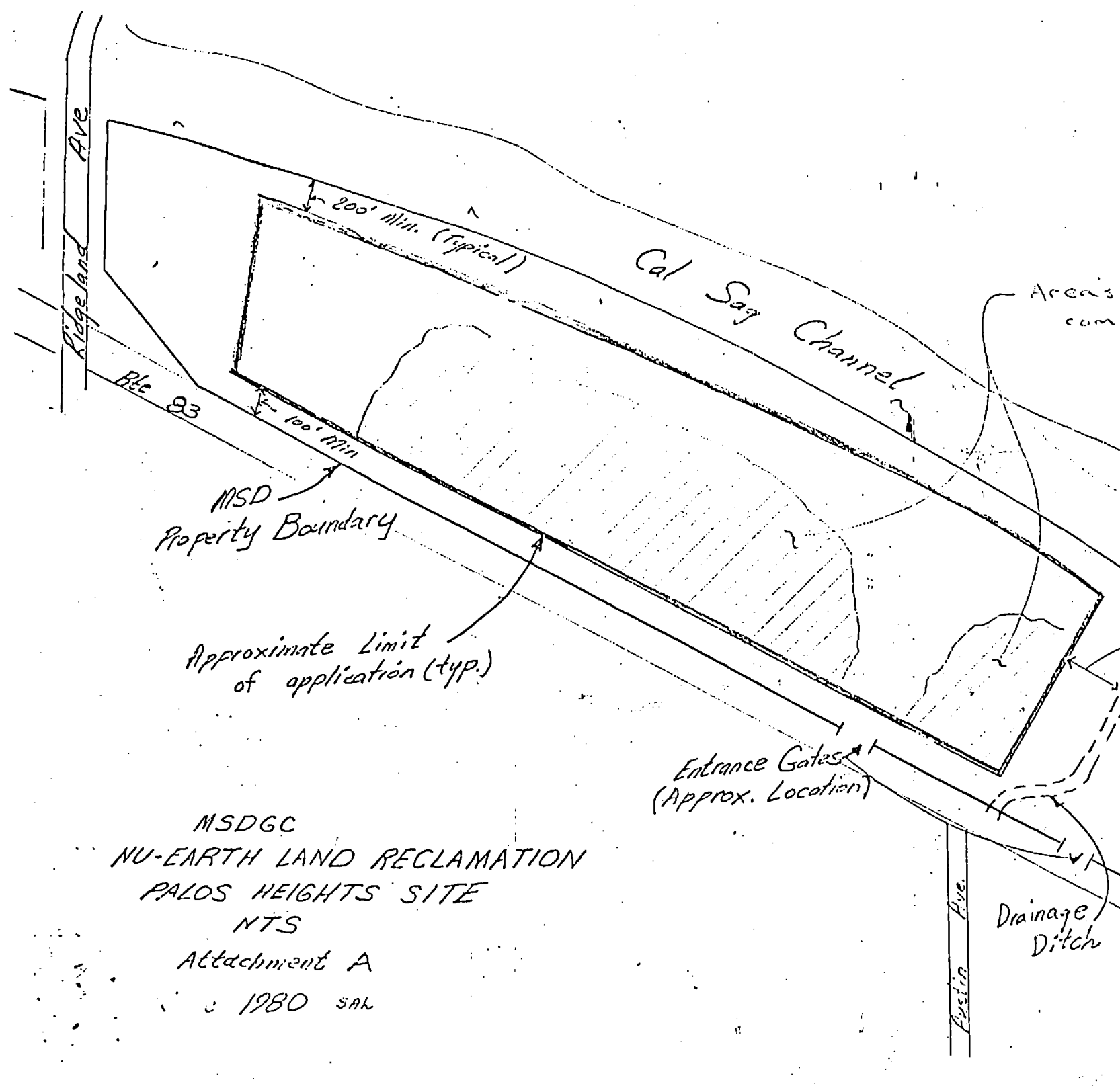
Very truly yours,



James B. Murray
Principal Assistant Attorney

JBM:jf
Attachment

cc: McMillan / Neil / Rimkus / Lavin



THE METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO

NU EARTH ANALYSES - H.A.S.M.A.

January, 1979 - March, 1979

Parameter (mg/kg)	#8-880 1/30/79	#8-887 2/9/79	#8-894 2/23/79	#8-899 3/2/79
pH (units)	8.0	7.3	8.6	8.5
Total Nitrogen (%)	2.31	1.60	2.02	1.37
Ammonia Nitrogen (%)	0.49	0.19	0.24	0.29
Total Solids (%)	54.12	48.42	58.04	76.40
Tot. Vol. Solids	25.75	27.55	23.16	11.94
P ₂ O ₅	3.31	3.76	1.22	1.26
Zinc	2310	1540	2223	1361
Cadmium	102	78	84	99
Copper	841	620	784	859
Chromium	1035	692	858	614
Iron	3.16	4.5	3.70	1.39
Nickel	185	103	155	131
Lead	724	376	424	512
Potassium	1478	2272	1378	524
Sodium	924	826	637	458
Calcium (%)	5.36	1.6	3.27	3.01
Magnesium (%)	1.02	0.35	0.78	1.36
Manganese	318	2024	226	259
Aluminum (%)	0.74	0.85	0.88	0.46
Mercury (ug/kg)	5617	7430	23019	4084

All parameters expressed as mg/kg dry weight basis except as noted.

ATTACHMENT C

DESCRIPTION OF OPERATION

The site will be cleared of any debris, which will be piled up and subsequently hauled away and properly disposed of. Berms will be constructed around the area where required to contain runoff to prevent runoff generated on the application area from going into the channel. The Nu Earth will be delivered by truck and deposited on the remaining usable acreage at the site. The material will then be spread at approximately a 1-foot thickness, via mechanical means. Upon completion of the spreading operation, the MSD will prepare and seed the entire 40 acre area. After the vegetative cover is established and the soil becomes stabilized, the berms will be removed and natural drainage patterns will again be established.